



Region 2

## **ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY**

01/12/2007

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

<b>EPA I.D. NUMBER:</b>	<b>NYD982725970</b>
<b>INSTALLATION NAME:</b>	<b>CONTINENTAL AUTOMOTIVE SYSTEMS</b>
<b>INSTALLATION ADDRESS :</b>	<b>611 JAMISON RD ELMA, NY 14059</b>
<b>MAILING ADDRESS :</b>	<b>611 JAMISON RD ELMA, NY 14059</b>

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2  
RCRA Programs Branch  
290 Broadway, 22nd Floor  
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS  
Tel : (212) 637-4106  
Fax: (212) 637-3056**

**TO: CONTINENTAL AUTOMOTIVE SYSTEMS  
or Current Occupant  
ATTN: FRANK COLLIS  
611 JAMISON RD  
ELMA, NY 14059**

**SEND COMPLETED  
FORM TO:**  
The Appropriate State or  
EPA Regional Office.

United States Environmental Protection Agency

**RCRA SUBTITLE C SITE IDENTIFICATION FORM**

**1. Reason for  
Submittal**  
(See instructions  
on page 13.)

MARK ALL BOX(ES)  
THAT APPLY

**Reason for Submittal:**

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☒ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # \_\_\_\_\_)
- ☐ As a component of the Hazardous Waste Report

**2. Site EPA ID  
Number (page 14)**

EPA ID Number N Y D 9 8 2 7 2 5 9 7 0

**3. Site Name**  
(page 14)

Name: **Continental Automotive Systems**

**4. Site Location  
Information**  
(page 14)

Street Address: **611 Jamison Road**

City, Town, or Village: **Elma**

State: **NY**

County Name: **Erie**

Zip Code: **14059**

**5. Site Land Type**  
(page 14)

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

**6. North American  
Industry  
Classification  
System (NAICS)  
Code(s) for the Site**  
(page 14)

A. 3 3 6 3 2 2

B.   

C.   

D.   

**7. Site Mailing  
Address**  
(page 15)

Street or P. O. Box: **611 Jamison Road**

City, Town, or Village: **Elma**

State: **NY**

Country: **USA (County: Erie)**

Zip Code: **14059**

**8. Site Contact  
Person**  
(page 15)

First Name: **Frank**

MI: **P.**

Last Name: **Collis**

Phone Number: **716-687-6066** Extension:

Email address: **frank.collis@motorola.com**

**9. Operator and  
Legal Owner  
of the Site**  
(pages 15 and 16)

A. Name of Site's Operator:  
**Continental Automotive Systems**

Date Became Operator (mm/dd/yyyy):  
**03 JULY 2006**

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner:  
**Temic Automotive of North America, Inc.**

Date Became Owner (mm/dd/yyyy):  
**03 JULY 2006**

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

9. Legal Owner (Continued) Address	Street or P. O. Box: One Continental Drive	
	City, Town, or Village: Auburn Hills	
	State: MI	
	Country: USA	Zip Code: 48326-1581

## 10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

## A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or☒ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous WasteY ☐ N ☒ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner Exemption☐ b. Smelting, Melting, and Refining Furnace ExemptionY ☐ N ☒ 6. Underground Injection Control

## B. Universal Waste Activities

- Y
- ☐
- N
- ☒
1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	Generate	Accumulate
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

## C. Used Oil Activities

Mark all boxes that apply.

- Y
- ☐
- N
- ☒
1. Used Oil Transporter
- 
- If "Yes", mark each that applies.
- 
- ☐
- a. Transporter
- 
- ☐
- b. Transfer Facility

- Y
- ☐
- N
- ☒
2. Used Oil Processor and/or Re-refiner
- 
- If "Yes", mark each that applies.
- 
- ☐
- a. Processor
- 
- ☐
- b. Re-refiner

Y ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer

If "Yes", mark each that applies.

- ☐
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- 
- ☐
- b. Marketer Who First Claims the Used Oil Meets the Specifications

## 11. Description of Hazardous Wastes (See instructions on page 21.)

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

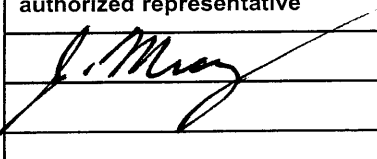
D001	D002	D003	D008	D009	D011	F002
F003						

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


## 12. Comments (See instructions on page 21.)

11A. Waste codes may vary from year-to-year, due to the variability of incoming materials that may end up being managed as waste (new waste profiles or materials being lab-packed for off-site disposal).

**13. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	James Mraz, Plant Manager	10/2/2006



**Continental Automotive Systems**  
**611 Jamison Road**  
**Elma, NY 14059**

28 July 2006

*via Certified Mail*

**Alan J. Steinberg, Regional Administrator**  
**US Environmental Protection Agency, Region II**  
**290 Broadway - 22<sup>nd</sup> FL**  
**New York, NY 10007-1866**

**Re: Notification of change of ownership (NYD982725970)**  
**Updated EPA Form 8700-12 (RCRA Subtitle C Site Identification Form)**

**Dear Mr. Steinberg:**

Effective 2 July 2006, Motorola's worldwide automotive electronics business was sold to Continental AG (headquartered in Hanover, Germany). Copies of two Motorola press releases regarding the sale are attached for your information (dated 3 April 2006 and 3 July 2006, respectively). The sale included Motorola's manufacturing facility in Elma, NY (**NYD982725970**). The purpose of this letter is to inform you of this ownership change and to request that EPA and NYSDEC update the appropriate database(s) to reflect this change in ownership regarding NYD982725970.

The legal owner of the Elma, NY, facility (NYD982725970) is now Temic Automotive of North America, Inc. (headquartered in Auburn Hills, MI). The various subsidiary companies of Continental AG that serve the automotive industry are collectively referred to as **Continental Automotive Systems** (or "CAS").

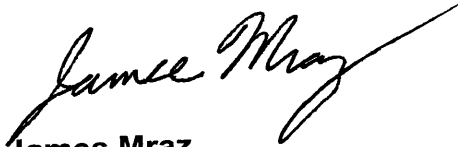
Although the Elma facility has changed ownership, the same local management team and workforce is in place. Manufacturing operations at CAS' Elma facility are not expected to change. The same products will be manufactured (various automotive sensors and control modules) using the same raw material components and chemicals. Accordingly, the environmental impact of the facility is not expected to change. Specifically in regard to its generation of hazardous waste, CAS' Elma facility (NYD982725970) will continue to operate as a **Small Quantity Generator (SQG)** of hazardous waste.

An **EPA Form 8700-12** (RCRA Subtitle C Site Identification Form) has been completed and is attached. A copy of this letter and attachments is also being sent to NYSDEC Headquarters in Albany and to NYSDEC Region 9 in Buffalo. Please update the appropriate database(s) to reflect this change in ownership.

Please contact **Frank Collis** at **(716) 687-6066** if you have any questions in this regard or if you require any additional information.

Sincerely,

**Continental Automotive Systems**



**James Mraz**  
Plant Manager

cc: **Nelson F. Schnabel, Environmental Engineer I**  
**NYS Department of Environmental Conservation**  
**Division of Solid and Hazardous Materials, Region 9**  
**270 Michigan Avenue**  
**Buffalo, NY 14203-2999**

**Ernie Robbins**  
**NYS Department of Environmental Conservation**  
**Division of Solid & Hazardous Materials**  
**625 Broadway**  
**Albany, NY 12233-7250**

**Continental Automotive Systems**  
**611 Jamison Road**  
**Elma, NY 14059**

10/3/06 4:54 PM

2 October 2006

Jack Hoyt  
US EPA Region II  
Division of Environmental Planning & Protection  
RCRA Programs Branch  
290 Broadway - 22<sup>nd</sup> FL  
New York, NY 10007-1866

**Re: Notification of change of ownership (NYD982725970)**  
**Updated EPA Form 8700-12 (RCRA Subtitle C Site Identification Form)**  
**Follow up to 28 JUL 2006 letter to Mr. Alan J. Steinberg**

Dear Mr. Hoyt:

Enclosed please find an EPA **Form 8700-12**, submitted to reflect the change in ownership of **NYD982725970** from Motorola, Inc., to Temic Automotive of North America, Inc. The attached copy of Form 8700-12 contains my original signature.

My 28 July 2006 letter to Mr. Alan J. Steinberg (EPA Regional Administrator, Region II) also contained an originally-signed EPA form 8700-12, but apparently it was never routed to your office. A copy of my 28 July 2006 letter to Mr. Steinberg is also attached because it contains pertinent information regarding the change in ownership of NYD982725970.

Please contact Frank Collis at (716) 687-6066 if you have any questions in this regard.

Sincerely,

**Continental Automotive Systems**



**James Mraz**  
Plant Manager

# RCRA Site Detail

Report run on: October 18, 2006 - 2:44 PM

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## NYD982725970 MOTOROLA INC

EPA Region 02 Extract Flag: Y Facility Identifier: County: ERIE

Basic Notes: EXTRACT\_FLAG UPDATED OCT 2003 VIA SQL

### Universes

Generator: SQG Transporter: N Active: Y  
Operating TSDF: ----- IC In Place: N EI Indicator (HE / GW): N / N

Activity Location: NY Source Type: Biennial Report Seq. Number: 5 Receive Date: 25 FEB 2004 Report Cycle: 2003

Other/Previous Site Name: MOTOROLA INC

Location JAMISON RD  
Address: ELMA, NY 14059

Mailing JAMISON RD  
Address: ELMA, NY 14059  
UNITED STATES

Contact Person FRANK P. COLLIS UNITED STATES  
For Source (716) 687-6066  
Information FRANK.COLLIS@MOTOROLA.COM

Owner (current) JAMISON RD Type: Private  
MOTOROLA INC ELMA, NY 14059  
From: 02/01/1990 To: ELMA Phone:

Operator (current) JAMISON RD Type: Private  
MOTOROLA INC ELMA, NY 14059  
From: 02/01/1990 To: ELMA Phone:

Land Type: Private Non Notifier: No Commercial Availability: Unknown Tsd Date:  
Accessibility: No. Employees: State District:

NAICS Codes: 336322 Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

Notes: 9A, 9B DATES ARE VERY CLOSE BUT NOT NECESSARILY EXACT / 11A WASTE CODES MAY VARY FROM YEAR-TO-YEAR DEPENDING ON  
CERTAIN MATERIALS THAT MAY BE LAB-PACKED. NY

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Small Quantity Generator; State: NY-1 Large Quantity Generator

### Transfer Facility:

### Used Oil Activities

Other Hazardous Waste Generator Activities		Used Oil Transporter Activity		Off-Specification Used Oil Burner:		No
Importer Activity:	No	Transporter:	No	Used Oil Fuel Marketer Activity		
Mixed Waste Generator:	No	Transfer Facility:	No	Marketer who directs shipment		
Transporter Activity:	No	Used Oil Processor and/or		off-specification used oil to		
TSD Activity:	No	Re-refiner Activity		off-specification used oil burner:		No
Recycler Activity:	No	Processor:	No	Marketer who first claims the used		
		Refiner:	No	oil meets the specifications:		No
Exempt Boiler and/or Industrial Furnace		Underground		Destination Facility for		
Small Quantity Onsite Burner Exemption:	No	Injection Control:		Universal Waste:		No
Smelting, melting, Refining Furnace						
Exemption:	No					

### Universal Waste Activities:

Description	Generated	Accumulated
Batteries	N	N
Lamps	N	N
Pesticides	N	N
Thermostats	N	N

Description of Hazardous Wastes (as reported on Site Identification Form)

EPA Waste Codes: D001, D002, D006, D008, D009, D011, F002

### Biennial Report Information

Total Quantity Reported (Tons): Generated: 2 Managed: 0 Shipped: 2 Received: 0

### Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
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# RCRA Site Detail

Report run on: October 18, 2006 - 2:44 PM

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**NYD982725970 MOTOROLA INC**

Continued...

## Top 10 GM Forms Summary - continued (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
FLAMMABLE SPENT ISOPROPYL ALCOHOL FROM SOLDER PRINTING MACHINE CLEANING OPERATIONS; CONTAINS ISOPROPYL ALCOHOL AND SOLDER PASTE RESIDUES.				
0	0			0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D008				
LAB PACK				
0	0			0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D002, D006, D008, LABP				
SPENT SOLDER FLUX CHEMICAL USED IN WAVE SOLDERING MACHINE CONTAINS APPROXIMATELY 18PPM LEAD IN SPENT FORM (D008). FLUX IS A MIXTURE OF WATER AND DICARBOXYLIC ACID.				
0	0			0 H077 - OTHER CHEMICAL PRECIPITATION
EPA Waste Codes: D008				
CYLINDER OF COMPRESSED HYDROGEN AND CYLINDER OF COMPRESSED PROPANE - NO LONGER NEEDED AND DISPOSED				
0	0			0 H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001				

Activity Location: NY Source Type: Biennial Report Seq. Number: 4 Receive Date: 26 FEB 2002 Report Cycle: 2001

Other/Previous Site Name: MOTOROLA INC

Location 611 JAMISON RD  
Address: ELMA, NY 14059

Mailing 611 JAMISON RD  
Address: ELMA, NY 14059  
UNITED STATES

Contact Person FRANK P. COLLIS  
For Source (716) 687-6066  
Information UNITED STATES

Geometric Type Code: Horizontal Collection Method: Reference Point Code:  
Horizontal Accuracy Measure: Horizontal Reference Datum: Source Map Scale Numbers: 0

Land Type: Bad code - X Non Notifier: No Commercial Availability: Unknown Tsd Date:  
Accessibility: No. Employees: 0 State District: NYSDEC R9

NAICS Codes: 336322 Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

Notes: Update 10/03 to ensure Leg\_Dist is associated with correct Counties

## Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State: NY-1 Large Quantity Generator

Transfer Facility:

## Used Oil Activities

### Other Hazardous Waste Generator Activities

Importer Activity: No  
Mixed Waste Generator: No

Transporter Activity: Unknown  
TSD Activity: No  
Recycler Activity: Unknown

### Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity Off-Specification Used Oil Burner: Unknown

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Processor and/or Re-refiner Activity  
Marketer who directs shipment off-specification used oil to off-specification used oil burner: Unknown

Processor: Unknown  
Refiner: Unknown  
Marketer who first claims the used oil meets the specifications: Unknown

Underground Injection Control: Unknown  
Destination Facility for Universal Waste: Unknown

## Universal Waste Activities:

Description	Generated	Accumulated
Batteries	U	U
Lamps	U	U
Pesticides	U	U
Thermostats	U	U

## Biennial Report Information

# RCRA Site Detail

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**NYD982725970 MOTOROLA INC**

Continued...

Total Quantity Reported (Tons): Generated: 6 Managed: 0 Shipped: 6 Received: 0

## Top 10 GM Forms Summary by Largest Quantity of Hazardous Waste Generated (All quantities are in tons)

Generated	Managed	Onsite Management Methods	Shipped	Offsite Management Methods
SPENT SOLDER FROM CHEMICAL USED IN WAVE SOLDERING MACHING CONTAINS APPROX. 18 PPM LEAD IN SPENT FORM (D008). FLUX IS A MIXTURE OF WATER AND DICARBOXYLIC ACIDS				
2	0		2	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008				
SPENT FLAMMABLE SOLVENT FROM SCREEN PRINTING OPERATIONS (ELECTRONIC INKS); MIXTURE OF ISOPARAFLINIC HYDROCARBONS (C9-12 ISOALKANES) AND I-PRRPOXY-2-PROPANOL. SECTION 1 A: THIS PROCESS (THICK-FILM ELECTRONIC NETWORK MAN				
1	0		1	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D008				
FLAMMABLE SPENT ISORPOPYL ALCOHOL FROM SOLDER PRINTER MACHINE CLEANING OPERATIONS; CONTAINS ISOPROPYL ALCOHOL AND SOLDER PASTE RESIDUES				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D008				
LEAD-CONTAINING SLUDGE (D008) FROM SOLDER PSTE SCREEN PRINTING CLEANING OPERATIONS; DETERGENT RESIDUES WITH SOLDER PAST E SLUDGE (CONTAINS LEAD) SECTION 1,E: PLEASE SEE SEC. 1 A "WASTE DESCRIPTION"				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D008, D011				
IGNITABLE SPENT SOLVENT FROM ELECTRONIC MODULE FAILURE ANALYSIS (DIGESTS SILICONE ENCAPSULATING MATERIAL); MIXTURE OF PETROLEUM NAPHTHA AND DODECYL BENZENE SULFONIC ACID OR METHYLEN				
0	0		0	H141 - STORAGE, BULKING AND/OR TRANSFER OFF SITE
EPA Waste Codes: D001, D002, F002				

Activity Location: NY Source Type: Biennial Report Seq. Number: 3 Receive Date: 01 JAN 2001 Report Cycle: 1999

Other/Previous Site Name: MOTOROLA

Location 611 JAMISON RD  
Address: ELMA, NY 14059

Mailing 611 JAMISON RD  
Address: ELMA, NY 14059

Contact Person FRANK COLLIS  
For Source (716) 687-6066  
Information

Land Type: Bad code - U Non Notifier: No Commercial Availability: Other - U Tsd Date:  
Accessibility: No. Employees: State District: NYSDEC R9  
NAICS Codes: 336322 Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

Notes: Update 10/03 to ensure Leg\_Dist is associated with correct Counties

### Regulated Waste Activities

Hazardous Waste Generator Status - Federal: Large Quantity Generator; State:

Transfer Facility: Unknown

### Used Oil Activities

Other Hazardous Waste Generator Activities

Importer Activity: Unknown  
Mixed Waste Generator: Unknown

Transporter Activity: Unknown

TSD Activity: No

Recycler Activity: Unknown

Exempt Boiler and/or Industrial Furnace

Small Quantity Onsite Burner Exemption: Unknown  
Smelting, melting, Refining Furnace Exemption: Unknown

Used Oil Transporter Activity

Transporter: Unknown  
Transfer Facility: Unknown

Used Oil Processor and/or Re-refiner Activity

Processor: Unknown  
Refiner: Unknown

Underground Injection Control: Unknown

Off-Specification Used Oil Burner:

Unknown

Used Oil Fuel Marketer Activity

Marketer who directs shipment off-specification used oil to off-specification used oil burner:

Unknown

Marketer who first claims the used oil meets the specifications:

Unknown

Destination Facility for Universal Waste:

Unknown

<b>SEND COMPLETED</b> <b>FORM TO:</b> The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>		
<b>1. Reason for Submittal</b> (See instructions on page 13.)  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
<b>2. Site EPA ID Number</b> (page 14)	EPA ID Number <u>N Y D 9 8 2 7 2 5 9 7 0</u>		
<b>3. Site Name</b> (page 14)	Name: <b>Continental Automotive Systems</b>		
<b>4. Site Location Information</b> (page 14)	Street Address: 611 Jamison Road City, Town, or Village: Elma State: NY County Name: Erie Zip Code: 14059		
<b>5. Site Land Type</b> (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. North American Industry Classification System (NAICS) Code(s) for the Site</b> (page 14)	A. <u>3 3 6 3 2 2</u> B. _____ C. _____ D. _____		
<b>7. Site Mailing Address</b> (page 15)	Street or P. O. Box: 611 Jamison Road City, Town, or Village: Elma State: NY Country: USA (County: Erie) Zip Code: 14059		
<b>8. Site Contact Person</b> (page 15)	First Name: Frank MI: P. Last Name: Collis Phone Number: 716-687-6066 Extension: Email address: frank.collis@motorola.com		
<b>9. Operator and Legal Owner of the Site</b> (pages 15 and 16)	A. Name of Site's Operator: Continental Automotive Systems Date Became Operator (mm/dd/yyyy): 03 JULY 2006 Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other B. Name of Site's Legal Owner: Temic Automotive of North America, Inc. Date Became Owner (mm/dd/yyyy): 03 JULY 2006 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner (Continued) Address	Street or P. O. Box: One Continental Drive	
	City, Town, or Village: Auburn Hills	
	State: MI	
	Country: USA	Zip Code: 48326-1581

## 10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

## A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)  
of non-acute hazardous waste; or☒ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)  
of non-acute hazardous waste; or☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)  
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous WasteY ☐ N ☒ 3. Treater, Storer, or Disposer of  
Hazardous Waste (at your site) Note:  
A hazardous waste permit is required for  
this activity.Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your  
site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial  
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner  
Exemption☐ b. Smelting, Melting, and Refining  
Furnace ExemptionY ☐ N ☒ 6. Underground Injection Control

## B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate  
5,000 kg or more) [refer to your State regulations to  
determine what is regulated]. Indicate types of universal  
waste generated and/or accumulated at your site. If "Yes",  
mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

## C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter  
If "Yes", mark each that applies.  
☐ a. Transporter  
☐ b. Transfer FacilityY ☐ N ☒ 2. Used Oil Processor and/or Re-refiner  
If "Yes", mark each that applies.  
☐ a. Processor  
☐ b. Re-refinerY ☐ N ☒ 3. Off-Specification Used Oil BurnerY ☐ N ☒ 4. Used Oil Fuel Marketer  
If "Yes", mark each that applies.  
☐ a. Marketer Who Directs Shipment of  
Off-Specification Used Oil to  
Off-Specification Used Oil Burner  
☐ b. Marketer Who First Claims the  
Used Oil Meets the Specifications



**11. Description of Hazardous Wastes (See instructions on page 21.)**

**A. Waste Codes for Federally Regulated Hazardous Wastes.** Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

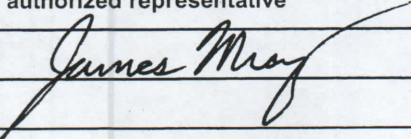
D001	D002	D003	D008	D009	D011	F002
F003						

**B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.** Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.


**12. Comments (See instructions on page 21.)**

11A. Waste codes may vary from year-to-year, due to the variability of incoming materials that may end up being managed as waste (new waste profiles or materials being lab-packed for off-site disposal).

**13. Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	James Mraz, Plant Manager	7/28/2006



*Jack  
Hoff*

~~RAB~~  
**COPY FOR YOUR  
INFORMATION**

*Steinberg  
Callahan  
Gervasio  
cc. Magdon  
Lapeste*

2006 AUG 21 AM 10:53

**Continental Automotive Systems  
611 Jamison Road  
Elma, NY 14059**

28 July 2006

via Certified Mail

*RAB*

**Alan J. Steinberg, Regional Administrator  
US Environmental Protection Agency, Region II  
290 Broadway - 22<sup>nd</sup> FL  
New York, NY 10007-1866**

**Re: Notification of change of ownership (NYD982725970)  
Updated EPA Form 8700-12 (RCRA Subtitle C Site Identification Form)**

**Dear Mr. Steinberg:**

Effective 2 July 2006, Motorola's worldwide automotive electronics business was sold to Continental AG (headquartered in Hanover, Germany). Copies of two Motorola press releases regarding the sale are attached for your information (dated 3 April 2006 and 3 July 2006, respectively). The sale included Motorola's manufacturing facility in Elma, NY (**NYD982725970**). The purpose of this letter is to inform you of this ownership change and to request that EPA and NYSDEC update the appropriate database(s) to reflect this change in ownership regarding NYD982725970.

The legal owner of the Elma, NY, facility (NYD982725970) is now Temic Automotive of North America, Inc. (headquartered in Auburn Hills, MI). The various subsidiary companies of Continental AG that serve the automotive industry are collectively referred to as **Continental Automotive Systems** (or "CAS").

Although the Elma facility has changed ownership, the same local management team and workforce is in place. Manufacturing operations at CAS' Elma facility are not expected to change. The same products will be manufactured (various automotive sensors and control modules) using the same raw material components and chemicals. Accordingly, the environmental impact of the facility is not expected to change. Specifically in regard to its generation of hazardous waste, CAS' Elma facility (NYD982725970) will continue to operate as a **Small Quantity Generator (SQG)** of hazardous waste.

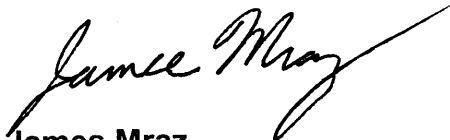
EPA-8700-12

An **EPA Form 8700-12** (RCRA Subtitle C Site Identification Form) has been completed and is attached. A copy of this letter and attachments is also being sent to NYSDEC Headquarters in Albany and to NYSDEC Region 9 in Buffalo. Please update the appropriate database(s) to reflect this change in ownership.

Please contact **Frank Collis** at (716) 687-6066 if you have any questions in this regard or if you require any additional information.

Sincerely,

**Continental Automotive Systems**



**James Mraz**  
Plant Manager

cc: **Nelson F. Schnabel, Environmental Engineer I**  
**NYS Department of Environmental Conservation**  
**Division of Solid and Hazardous Materials, Region 9**  
**270 Michigan Avenue**  
**Buffalo, NY 14203-2999**

**Ernie Robbins**  
**NYS Department of Environmental Conservation**  
**Division of Solid & Hazardous Materials**  
**625 Broadway**  
**Albany, NY 12233-7250**



## Press Release

### **Continental AG Announces Agreement to Acquire the Automotive Electronics Business of Motorola, Inc.**

- **Strategic move of a leading automotive supplier strengthens global presence and increases service and product offering for customers worldwide**
- **Integration into Continental increases growth potential and expands resources for the development of intelligent vehicle systems for safety electronics, body electronics, powertrain and telematics**

**Hanover/Detroit/Schaumburg/Frankfurt am Main, April 3, 2006.** Continental AG and Motorola, Inc. (NYSE: MOT) today jointly announced that the companies have entered into an agreement under which Continental, a leading automotive supplier, will acquire Motorola's automotive electronics business for approximately US\$ 1 billion in cash. The transaction includes Motorola's controls, sensor, interior electronics and telematics businesses. The acquired business will be integrated into Continental's Automotive Systems Division. The transaction is expected to be completed in the first half of 2006, and is subject to customary closing and regulatory conditions.

#### **Another milestone and perfect fit**

The acquisition marks another milestone in Continental's mission to make individual mobility safer.

- It will significantly increase its product portfolio and R&D capabilities in body and sensor electronics as well as powertrain and chassis controls.
- It will double overall sales of Continental's Automotive Systems division in North America.
- It will add a completely new and exciting technology to Continental's product range: telematics.
- Telematics will further enhance Continental's position as a leader in active and passive vehicle safety. It will allow Continental to intensify and expand the integration of features that help avoid collision with features of post crash safety/emergency assistance of occupants.

"This strategic move will further strengthen our position as a safety and systems supplier to the automotive industry and will give us a real push forward in automotive electronics," said Continental's Executive Board chairman Manfred Wennemer on Monday in Frankfurt.



- 3 -

Major customers include General Motors, Ford, Daimler Chrysler, BMW and Cummins. The business has three major product lines focusing on electronics parts and supplies:

- Telematics (embedded wireless vehicle communications)
- Powertrain and Chassis control (steering, suspension, occupant detection electronics and stability control)
- Body Electronics (heating ventilation, air conditioning and electronics for power doors, power seats, window lift and electric mirrors)

#### **Telematics adds new set of technologies**

"The integration of Motorola's automotive unit will enhance Continental's ability to offer our customers long-term technology solutions in the areas of telematics, safety electronics, powertrain as well as interior and sensor technologies," said Dr. Karl-Thomas Neumann, President of Continental's Automotive Systems Division. "The addition of telematics allows Continental Automotive Systems to take active/passive safety to the next level of functionality and performance. It will be integrated as a new business unit into the Division Automotive Systems."

"Continental Automotive Systems has made excellent progress over the past few years in integrating Active and Passive Safety Technologies, e.g. by linking safety systems such as Electronic Stability Control (ESC) with occupant safety elements like airbags. Our new telematics capabilities not only increase the functionality of active safety performance by helping to avoid collision, they also enhance the post crash safety and emergency assistance of occupants."

#### **Car-to-car digital communication**

"The integration of telematics opens the door to embedded car-to-car digital communication and vehicle-to-infrastructure communication, taking intelligent vehicle safety to the next level. We see great potential for this new, expanded capability as the automotive industry shifts focus towards more active safety. Finally, the acquisition of laboratories and R&D centers will increase our testing and leading-edge research capabilities and will further expand our engineering resources," Dr. Neumann added. "



- 5 -

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Director Corporate Communications  
Continental AG  
Vahrenwalder Str. 9  
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Tel.: +49 511 938-1485, Fax -1055  
Email: [prkonzern@conti.de](mailto:prkonzern@conti.de)

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[sue.frederick@motorola.com](mailto:sue.frederick@motorola.com)

Corporate Image and Video Library: [www.conti-online.com](http://www.conti-online.com)

0:57

**Motorola Completes Sale of Automotive Electronics Business to Continental AG**

SCHAUMBURG, Illinois – 3 July 2006 – Motorola, Inc. (NYSE: MOT) today announced it has completed the sale of its automotive electronics business to Continental AG, a leading automotive supplier, for approximately \$1 billion.

On 3 April 2006, Motorola and Continental AG announced that the companies had entered into an agreement under which Continental would acquire Motorola's automotive electronics business and integrate it into Continental's Automotive Systems division. Beginning on 2 July 2006, the former Motorola automotive unit began operating as Continental; however the assets and employees of the business in China will be transferred following the satisfaction of certain regulatory and other customary closing conditions.

In connection with this sale, the financial results of this business will be presented in accordance with Generally Accepted Accounting Principles (GAAP) as a discontinued operation in the company's 2nd quarter results, to be released on July 19, 2006. Therefore, reported sales in the earnings release to be issued July 19, 2006 for periods of 2006 and 2005 will exclude sales of this business, which has had sales of approximately \$400 million per quarter each quarter from the first quarter of 2005 through the first quarter of 2006. The guidance that the company provided on April 18, 2006 of \$10.3 - \$10.5 billion for its 2nd quarter 2006 sales included an assumption of approximately \$400 million of sales for the automotive electronics business. Therefore the company's guidance for the 2nd quarter of 2006 stated to exclude the automotive electronics business would have been \$9.9 - \$10.1 billion. This communication is not a reiteration of that sales guidance, it is being made to place that guidance in the proper context given the circumstances described above. The net earnings contribution from the automotive electronics business will be included in the company's GAAP reported earnings on a separate line titled Discontinued Operations.

**About Motorola**

Motorola is known around the world for innovation and leadership in wireless and broadband communications. Inspired by our vision of Seamless Mobility, the people of Motorola are committed to helping you get and stay connected simply and seamlessly to the people, information, and entertainment that you want and need. We do this by designing and delivering "must have" products, "must do" experiences and powerful networks -- along with a full complement of support services. A Fortune 100 company with global presence and impact, Motorola had sales of US \$36.8 billion in 2005. For more information about our company, our people and our innovations, please visit [www.motorola.com](http://www.motorola.com).

**Media Contacts:**

Jeff Madsen  
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+1-847-538-7660  
[Jeffrey.madsen@motorola.com](mailto:Jeffrey.madsen@motorola.com)

Jennifer Weyrauch  
Motorola Inc.  
+1-847-435-5320  
[Jennifer.weyrauch@motorola.com](mailto:Jennifer.weyrauch@motorola.com)

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Talk  
Hot

**COPY FOR YOUR  
INFORMATION**

Steinberg  
Callahan  
Sewick  
cc. Mugdan  
Japete.

**Continental Automotive Systems  
611 Jamison Road  
Elma, NY 14059**

28 July 2006

*via Certified Mail*

Alan J. Steinberg, Regional Administrator  
US Environmental Protection Agency, Region II  
290 Broadway - 22<sup>nd</sup> FL  
New York, NY 10007-1866

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ENVIRONMENTAL PROTECTION  
AGENCY  
REGION II  
06 AUG - 8 PM 4:11  
DIV. ENV. L.C. & P.H.

EPA-REGION II



An **EPA Form 8700-12** (RCRA Subtitle C Site Identification Form) has been completed and is attached. A copy of this letter and attachments is also being sent to NYSDEC Headquarters in Albany and to NYSDEC Region 9 in Buffalo. Please update the appropriate database(s) to reflect this change in ownership.

Please contact **Frank Collis** at (716) 687-6066 if you have any questions in this regard or if you require any additional information.

Sincerely,

**Continental Automotive Systems**

A handwritten signature in black ink, appearing to read "James Mraz", with a long, sweeping horizontal line extending to the right.

**James Mraz**  
Plant Manager

cc: **Nelson F. Schnabel, Environmental Engineer I**  
**NYS Department of Environmental Conservation**  
**Division of Solid and Hazardous Materials, Region 9**  
**270 Michigan Avenue**  
**Buffalo, NY 14203-2999**

**Ernie Robbins**  
**NYS Department of Environmental Conservation**  
**Division of Solid & Hazardous Materials**  
**625 Broadway**  
**Albany, NY 12233-7250**

9. Legal Owner (Continued) Address	Street or P. O. Box: One Continental Drive	
	City, Town, or Village: Auburn Hills	
	State: MI	
	Country: USA	Zip Code: 48326-1581

## 10. Type of Regulated Waste Activity

Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

## A. Hazardous Waste Activities

Complete all parts for 1 through 6.

Y ☒ N ☐ 1. Generator of Hazardous Waste

If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.)  
of non-acute hazardous waste; or

☒ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.)  
of non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.)  
of non-acute hazardous waste

In addition, indicate other generator activities.

Y ☐ N ☒ d. United States Importer of Hazardous WasteY ☐ N ☒ e. Mixed Waste (hazardous and radioactive) GeneratorY ☐ N ☒ 2. Transporter of Hazardous Waste
Y ☐ N ☒ 3. Treater, Storer, or Disposer of  
Hazardous Waste (at your site) Note:  
A hazardous waste permit is required for  
this activity.
Y ☐ N ☒ 4. Recycler of Hazardous Waste (at your site)Y ☐ N ☒ 5. Exempt Boiler and/or Industrial  
Furnace

If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner  
Exemption

☐ b. Smelting, Melting, and Refining  
Furnace Exemption
Y ☐ N ☒ 6. Underground Injection Control

## B. Universal Waste Activities

Y ☐ N ☒ 1. Large Quantity Handler of Universal Waste (accumulate  
5,000 kg or more) [refer to your State regulations to  
determine what is regulated]. Indicate types of universal  
waste generated and/or accumulated at your site. If "Yes",  
mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

Y ☐ N ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

## C. Used Oil Activities

Mark all boxes that apply.

Y ☐ N ☒ 1. Used Oil Transporter  
If "Yes", mark each that applies.  
☐ a. Transporter  
☐ b. Transfer Facility

Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner  
If "Yes", mark each that applies.  
☐ a. Processor  
☐ b. Re-refiner
Y ☐ N ☒ 3. Off-Specification Used Oil Burner
Y ☐ N ☒ 4. Used Oil Fuel Marketer  
If "Yes", mark each that applies.  
☐ a. Marketer Who Directs Shipment of  
Off-Specification Used Oil to  
Off-Specification Used Oil Burner  
☐ b. Marketer Who First Claims the  
Used Oil Meets the Specifications

<b>SEND COMPLETED</b> <b>FORM TO:</b> The Appropriate State or EPA Regional Office.	United States Environmental Protection Agency <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>		
<b>1. Reason for Submittal</b> (See instructions on page 13.)  MARK ALL BOX(ES) THAT APPLY	<b>Reason for Submittal:</b> <input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities) <input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information) <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input type="checkbox"/> As a component of the Hazardous Waste Report		
<b>2. Site EPA ID Number</b> (page 14)	EPA ID Number <u>N Y D 9 8 2 7 2 5 9 7 0</u>		
<b>3. Site Name</b> (page 14)	Name: <b>Continental Automotive Systems</b>		
<b>4. Site Location Information</b> (page 14)	Street Address: 611 Jamison Road		
	City, Town, or Village: Elma		State: NY
	County Name: Erie		Zip Code: 14059
<b>5. Site Land Type</b> (page 14)	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>6. North American Industry Classification System (NAICS) Code(s) for the Site</b> (page 14)	A. <u>3 3 6 3 2 2</u>		B. <u>  </u>
	C. <u>  </u>		D. <u>  </u>
<b>7. Site Mailing Address</b> (page 15)	Street or P. O. Box: 611 Jamison Road		
	City, Town, or Village: Elma		
	State: NY		
	Country: USA (County: Erie)		Zip Code: 14059
<b>8. Site Contact Person</b> (page 15)	First Name: Frank		MI: P. Last Name: Collis
	Phone Number: 716-687-6066 Extension:		Email address: frank.collis@motorola.com
<b>9. Operator and Legal Owner of the Site</b> (pages 15 and 16)	A. Name of Site's Operator: Continental Automotive Systems		Date Became Operator (mm/dd/yyyy): 03 JULY 2006
	Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: Temic Automotive of North America, Inc.		Date Became Owner (mm/dd/yyyy): 03 JULY 2006
	Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

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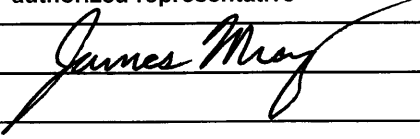
D001	D002	D003	D008	D009	D011	F002
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Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	James Mraz, Plant Manager	7/28/2006



## Press Release

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- 3 -

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- 5 -

Dr. Heimo Prokop  
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**Motorola Completes Sale of Automotive Electronics Business to Continental AG**

SCHAUMBURG, Illinois – 3 July 2006 – Motorola, Inc. (NYSE: MOT) today announced it has completed the sale of its automotive electronics business to Continental AG, a leading automotive supplier, for approximately \$1 billion.

On 3 April 2006, Motorola and Continental AG announced that the companies had entered into an agreement under which Continental would acquire Motorola's automotive electronics business and integrate it into Continental's Automotive Systems division. Beginning on 2 July 2006, the former Motorola automotive unit began operating as Continental; however the assets and employees of the business in China will be transferred following the satisfaction of certain regulatory and other customary closing conditions.

In connection with this sale, the financial results of this business will be presented in accordance with Generally Accepted Accounting Principles (GAAP) as a discontinued operation in the company's 2nd quarter results, to be released on July 19, 2006. Therefore, reported sales in the earnings release to be issued July 19, 2006 for periods of 2006 and 2005 will exclude sales of this business, which has had sales of approximately \$400 million per quarter each quarter from the first quarter of 2005 through the first quarter of 2006. The guidance that the company provided on April 18, 2006 of \$10.3 - \$10.5 billion for its 2nd quarter 2006 sales included an assumption of approximately \$400 million of sales for the automotive electronics business. Therefore the company's guidance for the 2nd quarter of 2006 stated to exclude the automotive electronics business would have been \$9.9 - \$10.1 billion. This communication is not a reiteration of that sales guidance, it is being made to place that guidance in the proper context given the circumstances described above. The net earnings contribution from the automotive electronics business will be included in the company's GAAP reported earnings on a separate line titled Discontinued Operations.

**About Motorola**

Motorola is known around the world for innovation and leadership in wireless and broadband communications. Inspired by our vision of Seamless Mobility, the people of Motorola are committed to helping you get and stay connected simply and seamlessly to the people, information, and entertainment that you want and need. We do this by designing and delivering "must have" products, "must do" experiences and powerful networks -- along with a full complement of support services. A Fortune 100 company with global presence and impact, Motorola had sales of US \$36.8 billion in 2005. For more information about our company, our people and our innovations, please visit [www.motorola.com](http://www.motorola.com).

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ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

NYD982725970

MOTOROLA INC.  
611 JAMINSON ROAD  
ELMA

NY 14059

INSTALLATION ADDRESS

611 JAMINSON ROAD  
ELMA

NY 14059

United States Environmental Protection Agency  
Washington, DC 20460  
**Notification of Hazardous Waste Activity**Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).**For Official Use Only**

Comments

C  
C

Installation's EPA ID Number

Approved

Date Received  
(yr. mo. day)C  
F

N Y 1 9 8 2 7 2 5 9 7 0

T/A  
C  
1

8 9 0 3 0 6

030306

**I. Name of Installation**

M O T O R O L A I N C.

**II. Installation Mailing Address**

Street or P.O. Box

C  
3

6 1 1 J A M I S O N

R O A D

City or Town

State

ZIP Code

C  
4

E L M A

N Y

1 4 0 5 9

**III. Location of Installation**

Street or Route Number

C  
5

A M E

City or Town

State

ZIP Code

C  
6**IV. Installation Contact**

Name and Title (last, first, and job title)

Phone Number (area code and number)

C  
2

B R U Y E R E W I L L I A M E N G

7 1 6 4 9 2 1 2 3 4

**V. Ownership**

A. Name of Installation's Legal Owner

B. Type of Ownership (enter code)

C  
R

M O T O R O L A I N C.

P

**VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)****A. Hazardous Waste Activity****B. Used Oil Fuel Activities**

- ☒ 1a. Generator ☐ 1b. Less than 1,000 kg/mo.
- ☐ 2. Transporter
- ☐ 3. Treater/Storer/Disposer
- ☐ 4. Underground Injection
- ☐ 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner

- ☐ 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner
- ☐ 7. Specification Used Oil Fuel Marketer (or On site Burner) Who First Claims the Oil Meets the Specification

**VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)**☐ A. Utility Boiler☐ B. Industrial Boiler☐ C. Industrial Furnace**VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))**☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify)**IX. First or Subsequent Notification**

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification ☐ B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number

ID — For Official Use Only																	
C																T/A	C
W																	1

# X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 2	F 0 0 3	F 0 0 5			
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
U 0 6 9					
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☒ 4. Toxic  
(D000)

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Dennis Fiehn</i>	Name and Official Title (type or print) DENNIS FIEHN, PLANT MANAGER	Date Signed 2/28/89
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# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 28, 2014 - 12:00 PM

Version 5.0

## User Selection Criteria

<b>Location:</b>	New York, all activities	<b>Activity Location:</b>	None Chosen
<b>Handler ID:</b>	NYD982725970	<b>Group of IDs:</b>	None Chosen
<b>Handler Name:</b>			
<b>Handler Universe:</b>	All Facilities Regardless of Universe		
<b>Determined Date Range:</b>	From: 10/01/1980 To: 07/28/2014		
<b>Location County Code:</b>	None Chosen	<b>Evaluation Type:</b>	
<b>Location City:</b>		<b>Focus Area:</b>	
<b>Location Zip Code:</b>		<b>Violation Type:</b>	
<b>State District:</b>	None Chosen	<b>Display Code Descrip.:</b>	Yes
<b>Sort Order:</b>	Region, State, Handler Name	<b>Display Universes:</b>	Yes

## Results

Data meeting the criteria you selected follows.

Total Pages:5      Total Handlers:1

## Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

## Report Information

Name: cme\_foia.rdf  
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance  
Deployed: June 2006  
Last Updated: May 2012  
Contact: rcrainfo.help@epa.gov  
Tables Used: cmecomp3, ccitation3, hreport\_univ5, lu\_citation, lu\_state, hid\_groups  
Libraries: none



# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 28, 2014 - 12:00 PM

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## CONTINENTAL AUTOMOTIVE SYSTEMS

County Name / Code: ERIE / NY029

NYD982725970

Location: 611 JAMISON RD; ELMA, NY 14059

REGION 02

Mailing: 611 JAMISON RD; ELMA, NY 14059

Activity Location: NY	State District: NYSDEC R9	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: Y
Generator: SQG	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

<b>Violation:</b>	Activity Location: NY	Type: 273.B	Determined Date: 01/07/2009	Determined by Agency: State	Responsible Agency: State
	Scheduled Compliance Date:		Actual Compliance Date: 02/02/2009	RTC Qualifier: DOCUMENTED	Sequence Number: 1
	Citation Information: Seq #	Type	Citation		
	1	STATE REGULATION	374-3.2(d)(4)		
<b>CEI Evaluation</b>	01/07/2009	Activity Location: NY	By: State	Identifier: 001	Person: NYTRN
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Branch: R9
				Day Zero: 01/07/2009	Found Violation: YES
					Focus Area:
<b>Enforcement:</b>	Activity Location: NY	Type: 120	Action Date: 01/15/2009	Identifier: 001	
	Docket:	Agency: State	Responsible Person: NYTRN	Branch: R9	
	CA Component: N	Disposition Status: AS 02/19/09	Appeal Initiated:	Appeal Resolved:	

### Evaluations With No Violations:

<b>CEI Evaluation</b>	09/11/2009	Activity Location: NY	By: State	Identifier: 001	Person: NYTRN	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 09/11/2009		Focus Area:
<b>CEI Evaluation</b>	04/28/2005	Activity Location: NY	By: State	Identifier: 001	Person: NYALS	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	08/06/2003	Activity Location: NY	By: State	Identifier: 001	Person: NYKHE	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	10/09/2002	Activity Location: NY	By: EPA	Identifier: 001	Person: R2RV	Branch: RCB	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	08/02/2000	Activity Location: NY	By: State	Identifier: 000	Person: NYRWK	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	01/24/1997	Activity Location: NY	By: State	Identifier: 000	Person: NYNSL	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	11/17/1994	Activity Location: NY	By: State	Identifier: 000	Person: NYRWK	Branch: R9	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
<b>CEI Evaluation</b>	02/22/1991	Activity Location: NY	By: State	Identifier: 001	Person: NYDEC	Branch:	Found Violation: NO
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

\* Note: Penalty amount may not reflect all violations cited.



# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 28, 2014 - 12:00 PM

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Total Number of Handlers: 1

Total Number of Activity Locations: 1

\* End of Report \*

\* Note: Penalty amount may not reflect all violations cited.



# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 28, 2014 - 12:00 PM

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## Description of codes used on the report:

Universes	Description of Universes
<b>Generator</b>	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
<b>Transporter</b>	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
<b>Operating TSDF</b>	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>IC in Place</b>	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
<b>EI Indicator (HE / GW)</b>	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
<b>Short-Term Gen</b>	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
<b>Transfer Facility</b>	Indicates that the facility transfers hazardous waste.
<b>Offsite Receiver</b>	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
<b>HSM</b>	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
<b>Subpart K</b>	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
<b>Full Enforcement</b>	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>CA Workload</b>	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
<b>Active State Gen</b>	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
<b>Converter</b>	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>State TSDF</b>	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
<b>State Unaddressed SNC</b>	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>State Addressed SNC</b>	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>State SNC w/ Compl. Sched</b>	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
<b>EPA Unaddressed SNC</b>	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>EPA Addressed SNC</b>	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
<b>EPA SNC w/ Compl. Sched</b>	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

\* Note: Penalty amount may not reflect all violations cited.



# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: July 28, 2014 - 12:00 PM

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## Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
273.B	UNIVERSAL WASTE - SMALL QUANTITY HANDLERS

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

\* Note: Penalty amount may not reflect all violations cited.